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Function:	Compliance Officer / Sustainability specialist	Valid for – if other than resp. function: Nilfisk Global	Doc. Number:	QES-0-COM0903
Language:	English	Document type: Policy	Rev. Number:	01
NILFISK	Nilfisk Global Substances of Concern Policy Appendix I. Global Conflict Minerals Policy		Effective date:	01 Jul 2023
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Nilfisk Global Substances of Concern Policy

Appendix I. Global Conflict Minerals Policy

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Version: 1.0
Revised June 2023
Approved by Head of Regulatory:
Preben Hosbond

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1. Purpose of the Policy

Nilfisk’s commitment to respect internationally recognized human rights impacted by its activities is reflected in its global actions, as well as principles and rules comprising, e.g., its Code of Conduct and Human Rights Policy. This commitment applies to its value chain, including procuring products that likely contain so-called *conflicts minerals* – e.g., tantalum, tin, tungsten, and gold, sourced from locations where armed conflicts are occurring, or where human rights abuses are key risks, such as unsafe mines or smelters. Therefore, Nilfisk has adopted Appendix I. *Conflicts Minerals Policy*, which supplements as an appendix Nilfisk’s broader *Substances of Concern Policy*.

Nilfisk is not currently subject to laws governing conflicts minerals. It does not directly source any of these metals directly, and their incorporation in products Nilfisk purchases may occur far up in its supply chain, which consists of direct suppliers and their many tiers of subcontractors. Nilfisk recognizes it is impossible to identify *all* its machines’ components and spare parts containing conflicts minerals, because its suppliers or their suppliers may be unable to identify if and when conflicts minerals enter their own supply chains.

Nevertheless, Nilfisk is committed to constantly enhancing its ability to identify conflicts minerals risks in its supply chain and to take appropriate actions to address and mitigate such risks. To accomplish this Nilfisk strives to implement applicable global industry standards, e.g., relevant aspects of the Organization for Economic Cooperation and Development (OECD) *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*. Nilfisk takes a risk-based approach in addressing conflicts minerals, focusing on products most likely to contain those metals.

2. Commitment regarding Conflict Minerals

Nilfisk is committed to:

- Encouraging suppliers to
 - Inform Nilfisk if they are sourcing conflict minerals.
 - Investigate their own supply chains.
 - Source products containing conflicts minerals from mines and smelters that comply with the international Responsible Minerals Initiative (RMI) principles.
 - Engage with us on efforts to follow RMI principles.
- Requesting relevant suppliers to complete and return questionnaires involving the presence of conflicts minerals in products supplied to Nilfisk.
 - Including when relevant the RMI Conflicts Minerals Reporting Template (CMRT)
- If feasible, find alternative suppliers for suppliers that will not follow RMI principles.

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3. Scope of the Policy

Nilfisk has adopted this Global Conflict Minerals Policy, covering key areas of Nilfisk’s production operations and global supply chain.

4. Policy Owner / Roles & Responsibilities

Nilfisk’s Legal Compliance, Regulatory, Strategic Sourcing and Sustainability Functions are co-responsible for supervising the implementation of, and for updating, this document.

The Global Substances of Concern Policy is formally approved by:
Head of Regulatory, Preben Hosbond

Policy Owner

The Regulatory team is the policy owner, ensuring that it is updated. The Global Conflict Minerals Policy will be **reviewed every second year**, to ensure that Nilfisk complies with applicable international standards and lives up to the expectations of our customers and stakeholders. The Regulatory team will collaborate with Sustainability, Strategic Sourcing and Global Compliance teams, and other relevant functions to align potential adjustments to the existing policy and overlapping policies.

The Global Compliance team also owns and maintains the **Code of Conduct, and Whistleblower Policy**, which overlaps this policy.

5. Conflict Minerals Declaration

Link to Nilfisk’s Conflict Minerals Reporting Template (CMRT); Revision 6.22, May 11 2022: [Click here](#)

6. Revision Log

Section	Rev	Description of Change	Review date	Reviewed by:	Approve date	Approved by:
All	01	Original Release (Initial Version)	10 June 2023	Malene Thiele	10 June 2023	Preben Hosbond

7. Related Nilfisk Policies

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[Nilfisk Code of Conduct](#)

[Nilfisk Whistleblower Policy](#)

[UK Modern Slavery Act](#)